

### REMARKS/ARGUMENTS

The Office Action mailed June 23, 2008 has been received and the Examiner's comments carefully reviewed. Claims 1-23 are rejected. Claims 6, 12-13, 20-21 are canceled. Claims 1-5, 7-11, 14-19, 22-23 are amended. For at least the following reasons, Applicants respectfully submit that the pending claims are in condition for allowance.

### Interview October 20, 2008

Applicants thank the Examiner for the courtesy of the in-person interview on October 20th, 2008. Present at the interview were the Examiner, Mr. Gregory Leibold, and Mr. Sung Kim. The independent claims as amended were discussed with regard to the cited reference. No agreement was reached with respect to allowability of the claims. The Examiner indicated that more detailed review of references may be required.

### Claim Rejections

Claims 1-23 are rejected under 35 U.S.C. 102(b) as being anticipated by Helgeson et al. (U.S. Publication No. 2002/0049749) (hereinafter "Helgeson").

As amended, Claim 1 recites in part "receiving rules from an administration client computing device. . .", "independently generating separate results of the property query rule . . .", "independently generating separate results of the member of rule . . .", "independently generating separate results of the reports under rule by determining if one or more of the plurality of users are located hierarchically under another user . . .", ". . . compiling the membership list of users by applying one or more conditional logic operators to combine the separate results of the property query rule, the separate results of the member of rule, and the separate results of the reports under rule", "associating the compiled membership list of users with content . . .", and ". .

. providing the content to the users listed within the compiled membership list.” In contrast, Helgeson does not teach at least: the three claimed rules used to compile an audience, a “reports under” rule, independently generating results of all three claimed rules, or thereafter combining results of rules with conditional operators.

The Office Action is Inconsistent in Use of the Term “Audience Members”

The Office Action alternately discusses the claimed “audience members” as “business objects” or as “users” depending upon what portion of the Helgeson reference to which reference is being made (see, e.g., ““Business Objects’ (audience)” at pg. 3 of Office Action; “control whether specific users have privileges” at pg. 5 of Office Action). As amended, Claim 1 is directed to “an audience that comprises a plurality of users.” Accordingly, portions of the Office Action that refer to the audience as “business objects” are moot in light of the amendments herein.

Helgeson Does Not Teach a Reports Under Rule

Helgeson does not disclose a “reports under” rule. Specifically, Helgeson does not disclose determining if a *user reports under another user* within a domain. As an example, two users may both belong to a hierarchical “Minneapolis” network domain. Each user may have different security permissions within that domain. Continuing with the domain example, these facts (users within a domain and security control within a domain) do not suggest or disclose a method for determining whether “BrianHa”, an associate within the “Minneapolis” domain, reports hierarchically under partner “KirstinS”, another user within the “Minneapolis” domain. Helgeson’s disclosure of a “domain” with “security,” or even membership to a domain, does not teach a “reports under” rule because there is no *determining* whether *a user reports*

*hierarchically under another user.* As such, Helgeson does not teach a reports under rule that determines if one or more users are “located hierarchically under another user.”

Helgeson Does Not Teach Applying Conditional Operators to Combine Separate Results of the Property Query Rule, the Member of Rule and the Reports Under Rule

Even if Helgeson described each of the three rules recited in Claim 1 (which it does not), Helgeson does not disclose “combining” the separate results of the three rules. According to the Office Action, (a) the property query rule corresponds to Helgeson’s description of finding objects via metadata (Office Action, pg. 4; Helgeson, [077-081], [0345]), (b) the member of rule is mapped to “fine-grained security control” (Office Action, pgs. 4-5; Helgeson, [0294], [0346], [0502]), and (c) the “reports under” rule is mapped to disclosure of domains and enforcement of “security checks.” (Office Action, pg. 5; Helgeson, [0294], [0346], [0958]). Even if these three items could be considered equivalent to the rules (which they are not), Helgeson does not disclose combining (a) the results of finding objects via metadata with (b) the results of “fine-grained security control” with (c) the results of domain and “security checks.” Because Helgeson does not disclose combining the results of all three of the purported rules, Helgeson fails to teach “applying one or more conditional logic operators to combine the separate results of the property query rule, the separate results of the member of rule, and the separate results of the reports under rule.”

Additionally, even if the mapping of the rules to Helgeson were accurate, and even if Helgeson disclosed combining the results all three rules, there is still no disclosure of combining the results via conditional operators. The Office Action appears to map applying one or more “conditional logic operators” to paragraph [0306] of Helgeson. (Office Action, pg. 4.) In [0306], Helgeson states that “[a] SabaObject is a *Java class defining a set of operations*

*common to all business objects*, including the ability to *get and set properties* using a variety of data types and the ability to save and restore an object's state. Specific business object classes *can subclass* SabaObject to add functionality and business logic *appropriate to that class*.” (Helgeson, [0306]) (emphasis added). The ability to add *operations to a Java class* or *subclass a Java class* is not equivalent to combining results of rules with conditional operators. A “get” property in a *Java class*, or a *Java subclass*, is *not* equivalent to a “conditional operator” that combines results of rules because, at the very least, no results are combined. Moreover, even if a Java class or subclass was equivalent to application of conditional operators, Helgeson does not disclose combining (a) the results from “finding objects via metadata” with (b) the results of “fine-grained security control” with (c) the results of domain and “security checks” by applying “a Java class” or subclass. As such, Helgeson does not disclose “applying one or more conditional logic operators to combine the separate results of the property query rule, the separate results of the member of rule, and the separate results of the reports under rule.”

Furthermore, the Office Action appears to map “compiling” the “membership list of users” to “. . . defining the sets of *allowed operations* that groups of users based on the class to which they belong can perform.” (Office Action, pg. 6; Helgeson, [0433].) (Emphasis added.) Compiling a membership list of users is not equivalent to defining a set of *allowed operations* for a *group of users*. As an example, a user may specify that a *group of users*, “Group1”, is *allowed* to access files on Server1. In the example, the allowed operation is “access” to files on “Server1” by “Group1”. Group1 is already defined. It may be that an administrator defined “Group1” by specifically adding users to the group. Defining one or more security restrictions

for a group is not equivalent to compiling a membership list of users because, at the very least, Helgeson does not explain how the group membership is even determined.

Helgeson Does Not Teach Associating the Compiled Membership List of Users to Content

The Office Action appeared to map “tagging content to the audience” with a disclosure of a “tag” in Helgeson. (Office Action, pg. 7). In Helgeson, a “tag” is a placeholder within a page *that is replaced at runtime*. For example, in paragraph [0565], Helgeson states that “[a]fter the model page is executed, *the tag will be replaced with the XML data . . .*” (Helgeson, [0565].) Replacing a tag with XML is not equivalent to tagging content to an audience. However, in the interest of expediting prosecution, Claim 1 has been amended to recite “associating the compiled membership list of users with content.” A “tag” to be replaced with XML cannot be considered equivalent to “associating the compiled membership list of users with content.” As amended, Claim 10 recites “associate the users of the audience with the content”, and as amended, Claim 16 recites “associating the members of the audience with the content.”

Claims Proposed To Be Allowable

For at least the reasons presented above, Claim 1 is proposed to be allowable. Claims 2-5, and 7-9 are proposed to be allowable as they depend from a valid base claim.

As amended, Claim 10 recites in part “. . . receive a plurality of rules from the management client device, the rules defining the audience, the rules comprising a property query rule, a member of rule and a reports under rule”, “independently generate separate results for the property query rule . . .”, “independently generate separate results for the member of rule . . .”, “independently generate separate results for the reports under rule that determines if one or more

users are located hierarchically under another user . . .”, “compile the rules to define the audience by combining the separate results of the property query rule, the separate results of the member of rule, and the separate results of the reports under rule with conditional logical operators . . .”, and “associate the users of the audience with the content.” For at least the reasons presented above, Claim 10 is proposed to be allowable. Claims 11, 14-15 are proposed to be allowable as they depend from a valid base claim.

As amended, Claim 16 recites in part “receiving a plurality of rules from an administrator client device”, “independently applying the plurality of rules . . . the plurality of rules comprise:”, “a property query rule . . .”, “a member of rule . . .”, “a reports under rule that independently determines if a user is located hierarchically under another user . . .”, “compiling the rules by gathering information from the organization structure to compile members of the audience, wherein the compilation applies conditional logic operators to combine the results from the property query rule, the results from the member of rule and the results from the reports under rule” and “associating the members of the audience with the content.” For at least the reasons presented above, Claim 16 is proposed to be allowable. Claims 17-19, 22-23 are proposed to be allowable as they depend from a valid base claim.

Conclusion

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned agent for the applicants at the telephone number provided below.

Respectfully submitted,

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